

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff

v.

**JEFFERSON COUNTY,
ALABAMA, et al.,**

Defendants.

**CIVIL ACTION NO.
CV-75-666**

**NOTICE OF FILING, AND MOTION FOR APPROVAL, OF
INITIAL SCHEDULE FOR DEVELOPMENT OF EMPLOYEE
SELECTION PROCEDURES**

The Receiver (1) respectfully gives notice of the filing of a proposed schedule for the development of lawful employee selection procedures for 17 jobs in Jefferson County's Roads and Transportation Department, and (2) moves the Court for an Order approving the schedule and giving it the force and effect of an Order of this Court.

In footnote 338 of its August 20, 2013 Memorandum Opinion, this Court made it known that the Receiver would be expected to submit a schedule for the development and revision of the County's employee selection procedures similar to the schedule entered by this Court on December 18, 2000 (Doc. No. 708) (and, later, under the Personnel Board Receivership, on April 24, 2003 (Doc. No. 1003)).

The proposed schedule attached as Exhibit 1 represents the Receiver's proposal for an initial phase of selection procedure development.¹ The general approach of the proposed schedule is modeled closely on the orderly and collaborative process utilized successfully at the Personnel Board some 10 years ago. The proposed schedule divides the first 17 jobs into four groups, provides for six well-defined deliverables and "consensus points," and allows at least three weeks of "peer review" time by the Martin-Bryant Parties and the United States at each consensus point. Undersigned counsel is authorized to state that the proposed schedule is acceptable to the Martin/Bryant Parties and the United States.

For the foregoing reasons, the Receiver requests that the Court enter an Order approving the schedule and giving it the force and effect of an Order of this Court.

Respectfully submitted,

/s/ Aaron L. Dettling
Counsel for Dr. Ronald R. Sims, Court-
Appointed Receiver

¹ The proposed schedule does not reflect all of the selection procedures that will need to be developed to fully execute the Receiver's charge under Paragraph 3(f) of the Order Appointing the Receiver. As noted in previous Monthly Reports, the Receiver has undertaken the task of developing lawful selection procedures for the County by focusing first on 17 jobs in the County's Roads and Transportation Department. (*See, e.g.*, April 2014 Monthly Report, Doc. No. 1881-1, at 3; May 2014 Monthly Report, Doc. No. 1884-1, at 2.) With an initial phase of clearly necessary development work underway, the Receiver intends to return to the task of working with the Martin-Bryant Parties and the United States to identify the universe of jobs for which employee selection procedures are required.

Of Counsel:

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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2014, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ Aaron L. Dettling
Of Counsel